

RANDALL S. LUSKEY (SBN: 240915)
rluskey@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (628) 432-5100
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)
ratkins@paulweiss.com
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)
cgrusauskas@paulweiss.com
ANDREA M. KELLER (*Pro Hac Vice* admitted)
akeller@paulweiss.com
**PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990

Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-MD-3084-CRB

**RENEWED NOTICE OF LODGING OF
SETTLEMENT AND RELEASE
AGREEMENT AND QUOTED LANGUAGE
PROVIDED TO THE COURT ON MARCH 1,
2024 PURSUANT TO COURT'S FEBRUARY
22, 2024 ORDER**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

*(Filed Concurrently with Administrative Motion
to Seal Materials, Declaration of Michael B.
Shortnacy, and [Proposed] Order)*

NOTICE OF LODGING

Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC hereby provide the Court with a copy of: (1) the Settlement and Release Agreement dated June 18, 2021; (2) Defendants' Submission of Settlement Agreements and Protective Orders with language quoted from the Agreement; and (3) Plaintiffs' Response to Defendants' Argument in Connection with filing of Settlement Agreements and Protective Orders (ECF No. 298-3) with language quoted from confidential settlement agreements, filed with the Court on March 1, 2024 pursuant to the Court's February 29, 2024 Order (ECF No. 305). Those materials are attached to this Notice.

This Notice is filed concurrently with an Administrative Motion to Seal Exhibits 1-3, in accordance with the Court's instruction during the February 22, 2024 hearing. *See* Tr. at 45:11-15;¹ *see also* Minute Entry, 3:23-md-3084-CRB, ECF No. 283 (Feb. 22, 2024) ("The parties may file this material with motions to seal.").

¹ "MAGISTRATE JUDGE CISNEROS: So just for clarity, if you all could file ... File under seal, you know, one to five exemplars of these confidentiality provisions. And I would prefer to get the entire settlement agreement with the identifying information redacted."

1 DATED: March 1, 2024

SHOOK HARDY & BACON LLP

2 By: /s/ Michael B. Shortnacy
MICHAEL B. SHORTNACY

3 MICHAEL B. SHORTNACY (SBN: 277035)
4 mshortnacy@shb.com
5 **SHOOK, HARDY & BACON LLP**
6 2049 Century Park East, Ste. 3000
7 Los Angeles, CA 90067
8 Telephone: (424) 285-8330
9 Facsimile: (424) 204-9093

10 PATRICK OOT (*Admitted Pro Hac Vice*)
11 oot@shb.com

12 **SHOOK, HARDY & BACON LLP**
13 1800 K St. NW Ste. 1000
14 Washington, DC 20006
15 Telephone: (202) 783-8400
16 Facsimile: (202) 783-4211

17 KYLE N. SMITH (*Pro Hac Vice* admitted)
18 ksmith@paulweiss.com

19 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)
20 jphillips@paulweiss.com

21 **PAUL, WEISS, RIFKIND, WHARTON**
22 **& GARRISON LLP**
23 2001 K Street, NW
24 Washington DC, 20006
25 Telephone: (202) 223-7300
26 Facsimile: (202) 223-7420

27 *Attorney for Defendants*
28 UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC